

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION
IN ADMIRALTY**

In the Matter of the Complaint of Chicago
AquaLeisure, LLC, and Theresa Tran,
individually and as owners and/or owners *pro*
hac vice of the vessel LA AQUAVIDA,
Official Number GFNCY003E20 &
DOCUMENTATION #1155272, for
Exoneration from or Limitation of Liability

No. 1:22-cv-06478

**MOTION FOR (1) APPROVAL OF STIPULATION
FOR VALUE AND COSTS, (2) ORDER RESTRAINING ALL
SUITS AND DIRECTING MOTION TO ISSUE, AND (3) ORDER
DIRECTING EXECUTION OF MONITION AND PUBLICATION OF NOTICE**

Plaintiffs CHICAGO AQUALEISURE, LLC and THERESA TRAN (hereinafter “PLAINTIFFS”), as owners and/or owners *pro hac vice* of the vessel LA AQUAVIDA, Official Number GFNCY003E203 (hereinafter “AQUAVIDA”), having filed a complaint under the Limitation of Liability Act, 46 U.S.C. § 30501 *et seq.*, hereby apply to the Court for issuance of the following orders pursuant to Rule F of the Federal Rules of Civil Procedure, Supplemental Rules for Certain Admiralty of Maritime Claims:

1. That the Ad Interim Stipulation for Value and Costs lodged concurrently herewith be approved by the Court and accepted as sufficient to satisfy the security requirements of 46 U.S.C. 30511 and Supplemental Rule F(1) of the Federal Rules of Civil Procedure, and directing the Clerk of Court to accept payment into the Court’s registry of \$71,637.00 and One Thousand Dollars 00/100 (\$1,000.00), respectively, in satisfaction of those requirements. A Registry Deposit

Information Form for the Supplemental Ad Interim Stipulation for Value is attached hereto as Exhibit A. A Registry Deposit Information Form for the Stipulation for Costs is attached hereto as Exhibit B. A copy of the proposed Order is attached as Exhibit C.

2. That the Order Restraining All Suits and Directing Monition to Issue lodged concurrently herewith be issued by the Court;. A copy of the proposed Order is attached as Exhibit D. A copy of the proposed Notice is attached as Exhibit E.

Dated: November 21, 2022.

Respectfully Submitted,

/s/ Robert J. Franco

One of the Attorneys for the Limitation Plaintiffs
Chicago AquaLeisure, LLC and Theresa
Tran

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